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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARIVELLE NUNEZ AS TRUSTEE FOR
MARIVELLE NUNEZ REVOCABLE
LIVING TRUST,

Plaintiff,

v.

HOMEFIELD FINANCIAL, INC.;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.;
NATIONSTAR MORTGAGE, LLC;
KEYBANK NATIONAL ASSOCIATION; and
DOES 1 through 10, inclusive; ROE
CORPORATIONS 1 through 10, inclusive

Defendants.

CASE NO. 2:16-cv-01504-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINE TO
NATIONSTAR MORTGAGE, LLC's
MOTION FOR SUMMARY
JUDGMENT [ECF NO. 42]**

[SECOND REQUEST]

NATIONSTAR MORTGAGE, LLC

Counterclaimant/Crossclaimant,

v.

MARIVELLE NUNEZ AS TRUSTEE FOR
MARIVELLE NUNEZ REVOCABLE
LIVING TRUST; SILVER TURTLE
HOMEOWNER'S ASSOCIATION; and
NEVADA ASSOCIATION SERVICES

Counter-Defendant/Cross-Defendants

Defendant/Counterclaimant/Cross-Claimant Nationstar Mortgage LLC (**Nationstar**) and
Defendant Mortgage Electronic Registration Systems, Inc. (**MERS**, collectively **Defendants**) and
Plaintiff/Counter-Defendant Marivelle Nunez as Trustee for Marivelle Nunez Revocable Living

1 Trust (**Plaintiff**), by and through their respective counsel of record, stipulate to extend Plaintiff's
2 deadline to respond to Defendant Nationstar Mortgage LLC's motion for summary judgment
3 [ECF 42] for fourteen (14) additional days as follows:

4 1. Plaintiff filed its complaint in the Eighth Judicial District Court of Clark County,
5 Nevada on May 4, 2016 asserting quiet title/declaratory relief and injunction relief against
6 Defendants.

7 2. Nationstar removed this action to the United States District Court, District of
8 Nevada on June 24, 2016 [ECF No. 1].

9 3. MERS & Nationstar answered Plaintiff's complaint on July 15, 2016 [ECF No. 4
10 & 6].

11 4. This Court entered a discovery plan and scheduling order on May 23, 2019, setting
12 a November 19, 2019 dispositive motions deadline [ECF No. 27]. An order granting the parties'
13 stipulation for an extension of the November 19, 2019 deadline was entered on September 23,
14 2019, extending the dispositive motions deadline to February 3, 2020 [ECF No. 40].

15 5. The parties stipulated to extend the Plaintiff's deadline to respond to Nationstar
16 Mortgage LLC's motion for summary judgment [ECF 42] to **March 9, 2020**, to allow time for
17 the parties to continue settlement negotiations which, if finalized, will resolve all pending claims.

18 6. Due to the unique nature of this case, those settlement discussions will require
19 additional time to complete.

20 7. The parties therefore stipulate to extend the Plaintiff's deadline to respond to
21 Nationstar Mortgage LLC's motion for summary judgment [ECF 42] for fourteen (14) days, up
22 to and including **March 23, 2020**, to allow time for the parties to continue settlement negotiations
23 which, if finalized, will resolve all pending claims between them.

24 8. The parties are currently evaluating a settlement arrangement that is atypical of
25 these types of cases, as the original homeowner purchased the property from the HOA foreclosure
26 sale buyer and is plaintiff in this action against the loan servicer, Nationstar, thus necessitating
27 considerations between a borrower and lender not at issue in other cases.
28

1 9. The parties do not file this stipulation with the intent to delay or bad faith.

2 DATED this 9th day of March 2020.

3
4 **AKERMAN LLP**

5 /s/ Donna M. Wittig

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14 Registration Systems, Inc.

5 **THE LAW OFFICE OF MIKE BEEDE, PLLC**

6 /s/ Michael N. Beede

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13 Attorneys for Marivelle Nunez as Trustee for
14 Marivelle Nunez Revocable Living Trust

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16 **IT IS SO ORDERED.**

17 
18 UNITED STATES DISTRICT JUDGE

19 Dated: March 10, 2020.
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